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8 Attorney for Petitioner

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12	ODILIO MISAEL ORELLANA	)	CASE NO. 3:26-cv-01756-CRB
13	REYES,	)	
14		)	PETITIONER'S MOTION FOR
15	Petitioner	)	PRELIMINARY INJUNCTION
16		)	
17	vs.	)	
18		)	
19	SERGIO ALBARRAN, Field	)	
20	Office Director of the San	)	
21	Francisco Immigration and	)	
22	Customs Enforcement Office;	)	
23	TODD LYONS, Acting Director of	)	
24	United States Immigration and	)	
25	Customs Enforcement; KRISTI	)	
	NOEM, Secretary of the United	)	
	States Department of Homeland	)	
	Security, PAMELA BONDI,	)	
	Attorney General of the United	)	
	States, acting in their official	)	
	capacities,	)	
		)	
	Respondents	)	
		)	

1 Pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure, Petitioner requests that
2 the Court or that Respondents must immediately release him from their custody.

3 Petitioner further requests that the Court enjoin Respondents from re-detaining Petitioner
4 in the future unless and until a hearing can be held before a neutral adjudicator to determine
5 whether his re-detention would be lawful and whether the government has shown that he is a
6 danger or a flight risk by clear and convincing evidence.

7 Petitioner also requests that the Court enjoin Respondents from imposing any additional
8 conditions or restrictions on Petitioner, including, but not limited to, electronic monitoring or
9 home visits that were not imposed prior to his March 1, 2026 detention.
10

11 Petitioner also seeks a temporary restraining order enjoining the Respondents from
12 transferring him outside of the Northern District of California and the United States pending final
13 resolution of this case.

14 Petitioner further moves for the issuance of an order to show cause as to why a
15 preliminary injunction should not issue.

16 This application is supported by the Memorandum of Points and Authorities,
17 accompanying exhibits, as well as any additional submissions that may be considered by the
18 Court.
19

20 Respectfully submitted,

21 Date: March 18, 2026

22 By: /s/ Connie Chan
23 Connie Chan
24 Attorney for Petitioner
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